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**PUBLIC DOCUMENT**

Mr. Andrew Stephens  
Director of Steel Trade Policy  
Office of Industry  
Office of the USTR  
600 Seventeenth Street, N.W.  
Washington, D.C. 20508

**Re: Certain Steel Products (Investigation No. TA-201-73)**

Dear Mr. Stephens:

We represent the European Union producers of Tool Steel in the above-captioned U.S. International Trade Commission investigation. Pursuant to the USTR's Federal Register notice *Public Comments on Potential Action Under Section 203 of the Trade Act of 1974 With Regard to Imports of Certain Steel*, 66 Fed. Reg. 54321 (October 26, 2001), on November 13, 2001 we submitted our clients' requests to exclude products from import relief under Section 203. In the effort to facilitate discussion with the domestic industry, on behalf of our clients we hereby give consent to the release of our November 13th confidential submission to the counsel of the domestic producers of Tool Steel, covered by the Administrative Protective Order in this case. In addition, we hereby submit the following list of products, which is public information

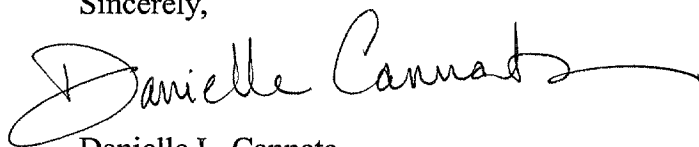
that summarizes our previous exclusion requests. These products are not made domestically (or not made in commercial qualities) and are not substitutable, and therefore should be excluded:

- High Speed Steel in the Form of Peeled and Polished Bar
- High Speed Steel in Form of Billets
- High Speed Steel in the Form of Hot-Rolled Coil
- High-Speed Steel Sheet and Strip
- Hand Hack Saw Blanks of High-Speed Steel
- Flat and Square Bars of High-speed Steel
- Shaped Edgewire of High-Speed Steel
- Circular Disks of High-Speed Steel
- Flat Rolled products of a width of 600mm or more and a thickness of less than 4.75mm
- Flat Rolled products of a width of 600mm or more and a thickness of 4.75mm or more
- Flat Rolled products of a width of 300mm or under 600mm wide
- Böhler Cross Rolled High Speed Steel Sheets/Plates annealed and shot peened
- Böhler W321 ISOBLOC (ESR remelted) – Hot work Tool Steel
- Chipper knife steel (Böhler K329) – long product
- Dievar is a premium modified hot work Tool Steel from Uddeholm
- 4150 (V310), A-8. (K329) manufactured into special sections or profiles (shapes) utilized for a specific purpose, such as tooling for press brakes
- Böhler K340 ISODUR (ESR execution) - Cold work Tool Steel
- Böhler W310 ISOBLOC (ESR execution) – Hot work Tool Steel
- QRO 90/80 SUPREME Premium (patented, US-patent 4459162) special hot work Tool Steel from Uddeholm
- AISI P20 Tool Steel Plate over 150mm
- Uddeholm Orvar Supreme (ESR execution)
- Böhler W302 ISOBLOC (ESR execution)
- Böhler W402 VMR (VAR-execution) Hot work Tool Steel
- DIN.2379 (AISI D-2) Forged blocks. Thickness sizes 6” through 12”
- DIN No. 2379 (AISI D-2) Round Bars, forged electric arc melted, non ESR/VAR- Sizes 16.5” through 30”
- DIN.2324 (AISI S-7) “mold quality steel for the manufacture of lense quality molds. Sizes .5” to 4.75” thickness (plates)
- DIN.2324 (AISI S-7) “mold quality steel for the manufacture of lense quality molds. Sizes 5.00” to 12.00” thickness (blocks forged)
- DIN.2363 (AISI A-2) forged blocks- Sizes 6.00” to 12.00”
- DIN.2767 (AISI. 6F7) flats and blocks
- DIN.2738 (AISI. P20 Mod.) hardened and tempered flats and blocks (high hard) – Sizes range 1.00” – 30.00” thickness
- DIN.2344 ESR (AISI H-13) Hot rolled, anneal, flats to General Motors Specification

- DC 9999-1 Rev – Ford Motor Co. specification AMTD DC 2010 Rev. 3. Daimler Chrysler NP2080-1983 - Sizes .50" to 7.50" thickness
- DIN.2344 ESR (AISI H-13) Forged, annealed, blocks to General Motors Specification DC 9999-1 R – Ford Motor Co. Specification AMTD DC 2010 Rev. 3. Daimler Chrysler NP 208-1983 – Sizes 7.75" to 24.00" thickness
  - DIN.2344 ESR (AISI H-13) Hot rolled rounds to General Motors Specification #DC 9999-1 Rev. 17 – Daimler Chrysler Specification #NP 2080-1983 – Sizes .50" to 7.25" Diameter
  - DIN.2344 ESR (AISI H-13) Forged rounds to General Motor Specification #DC 9999-1 Rev. 17 – Ford Motor Specification #AMTD DC 2010 Rev. 3 – Daimler Chrysler Specification "NP 2080-1983 – Sizes 7.5" to 24.00" Diameter
  - E38K ESR – Round bars
  - E38K ESR remelted flats and blocks
  - DIN.2714 (AISI 6F3) Round bars
  - DIN.2714 (AISI 6F3) flats and blocks
  - DIN.2999 ESR (No AISI Equivalent) flats
  - DIN.2381 AISI S-5 Round bars
  - DIN.2367 (No AISI Equivalent) Round bars
  - FOR 821 ESR Rounds (No AISI Equivalent)
  - AISI P-20 Hot rolled, pre-hard, plates – Sizes .50" to 7.50" thickness
  - AISI P-20 Forged, pre-hard, blocks – Sizes 7.75" to 30.00" thickness
  - CR7V-L is a special Tool Steel grade for forging dies
  - Superplast P20 with a unit weight greater than 50 tons
  - Superplast P20 Tool Steel plate with a thickness greater than 150mm
  - Forged Tool Steel Bar, ASTM A681, grades D2, H13, A2, and S7

Please do not hesitate to contact the undersigned if you should have any questions regarding this submission.

Sincerely,



Danielle L. Cannata  
Gary N. Horlick  
O'MELVENY & MYERS LLP

Counsel to the European Union producers of  
Tool Steel